

DOCKET FILE COPY ORIGINAL

2635 Westminster Ave  
Stockton, CA 95204  
August 31, 1995

Mr. Reed Hundt, Chairman  
Federal Communications Commission  
1919 M Street N. W.  
Washington, D. C. 20554

93-48  
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SEP 05 1995

FCC MAIL ROOM

Dear Mr. Hundt:

I was impressed by your concern for children's programming when you appeared on PBS August 29.

Much as I desire, as you do, to improve and increase the programming which will stress harmless growth and good ideals for young people, I strongly disagree with the suggestions you appear to be supporting.

You appear to place some credence in the use of the V-chip, which the children on the program found laughable, since many parents are not at home, and the children know that forbidden programming could be either found or recorded at someone else's home. This suggestion is a technical fix which does not fix.

You wish to hear from the public about regulations, specifying that networks which have stations holding licenses must present a certain minimum of time on the air for these quality programs. If they fail to live up to the regulations, the FCC will remove their licenses.

May I attack the idea that the FCC will enforce the regulations by quoting your own statement that the FCC has not suspended a license for 15 years for program causes. The Congress indeed passed a law as you specified, but the tone of Congress is far different. Their attitude is to rewrite the law to deregulate rather than enforce the regulations which are already set forth by the FCC. Your threat has no credibility, since it simply means the FCC will be dragged into court for an indefinite period of time if it tries to take a license away for this kind of failing. The FCC's reputation is something like that of a toothless tiger. If it imposed fines of sizable amount it might be believed, but this proposal to lift licenses is unworkable.

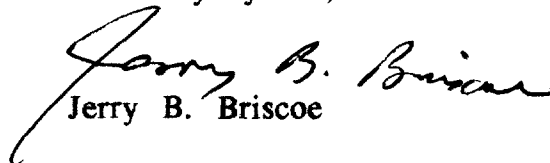
The broadcasters who manage to stay in control of networks have about as much conscience as a dinosaur. Their idea of serving the public with good programming is to offer identical types of programs opposite their rivals in order to cut their rival's ratings. Under the competitive system, they will run their children's programming the same way, to drive down each other's rating. Instead of expanding the number of opportunities for children, they will put the children's shows off in a restricted corner of the day all at the same time.

Do not waste your time trying to require them to come up with creative children's programming. Instead, extract from them some significant sums to be paid yearly into a children's broadcasting authority, or into PBS, with the proviso that these shows will be produced by people who believe in quality children's programs. I admit that this proposal goes contrary to the outcry on Capitol Hill, but it is at least a proposal to get some more programming done. If your proposal is carried forward it will fail.

The free ride which the television networks have had from the American people since the twenties is something like allowing the cattle ranchers to graze the public lands almost free. They have desecrated the airwaves with sleaze and have paid nothing to the public. If Congress wants to cut off the funding for worthwhile public broadcasting, then let the FCC go to bat for extracting funds from these vipers.

I admit that when I heard your remarks I was reminded of Newton Minnow, and I would like to believe you will take to heart the sad state of television. I do not believe, however, that these proposals are significant or practical.

Sincerely yours,

  
Jerry B. Briscoe



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Chairman Reed Hundt  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

RE: MM Docket No. 93-48

Dear Chairman Hundt:

The California Broadcasters Association is **very strongly** opposed to the proposed "tightening" of the Children's Television Act.

The primary reason new proposed rules are not needed is because we are happy to report broadcasters have **already significantly increased educational and informational programming**. Additionally, such programming is going to be increased even more.

Implementing a "quota" system flies in the face of the public's control of the airwaves through their needs and desires as consumers.

Also, short segment programming should get credit because it is:

1. Important
2. Has more impact because of a child's attention span

Broadcasters understand the importance of the Children's Television Act. That's why we are responding so well. The Children's Television Act will do the job if it is allowed to do so. **No further rules are needed.** Thank you.

Sincerely,

Dino Corbin  
President

Stan Statham  
Executive Director



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**WNEM Television**  
Broadcasting Group/Meredith Corporation  
107 N. Franklin St. (48607)  
P.O. Box 531 (48606-0531)  
Saginaw, Michigan  
517 755-8191

Paul T. Virciglio  
Vice President and  
General Manager

August 30, 1995

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SEP 03 1995

FCC MAIL ROOM

Chairman Reed Hundt  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

Dear Chairman Hundt:

RE: MM Docket No. 93-48

As you know, broadcasters have significantly increased children's educational and informational programming in response to the Children's Television Act.

Additional rules quantifying (quotas) the amount of educational and informational programming are unnecessary. Quantification sets the maximum as well as the minimum.

The children's act and the current FCC rules are working and when you address MM Docket No. 93-48, I urge your support in determining that new rules are not needed.

Best regards,

Paul T. Virciglio

CC: Mr. Edward O. Fritts  
Mr. Henry L. Baumann  
Mr. Charles E. Sherman

# **KOLR 10**

Independent Broadcasting Company  
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(417) 862-1010

Ellis Shook, Vice President  
General Manager

DOCKET FILE COPY ORIGINAL

August 31, 1995

Secretary  
Federal Communications Commission  
1919 M Street NW  
Washington, DC 20554

RE: MM Docket No. 93-48

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To Whom It May Concern:

This letter is with reference to the proposed rule making dealing with the "Children's Television Act" and further rule making by the FCC.

It is my sincere hope that you will drop or severely modify your plans for additional regulations about Children's Television Programming.

First of all, there have been numerous studies showing that the age group that you are talking about is extremely difficult to reach on television. Most of the programming seems to satisfy adults, but the children are not there to watch it. That does not mean we should not do children's programming that is meaningful, but over the last couple of year's broadcasters have manifestly demonstrated that they are doing much more programming that deals with "educational and informational children's programming."

I would urge you to take a much more contemporary approach to television and take advantage of its strengths which are primarily being "intrusive." That is a term that generally is applied to commercials, but if you would give program recognition to thirty, sixty, ninety or two minute messages that really address the area of educational and informational programming, these announcements would find the children who are watching sitcoms, dramatic shows, children's programming or any other program forms where children are watching.

It is very difficult to quantify quality. Since 1934 we have not been able to define the "public convenience interest and necessity." Isn't there a lesson to be learned from that?

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Another major point is to find a way to address those few broadcasters who are not fulfilling the intent of the law and the rules. Don't simply create a new set of problems for those broadcasters who are doing a good job, and find a way to recognize and encourage them.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ellis Shook". The signature is fluid and cursive, with the first name "Ellis" and last name "Shook" clearly distinguishable.

Ellis Shook  
General Manger

ES:ms

cc: Chairman Reed Hundt  
Commissioner James Quello  
Commissioner Andrew Barrett  
Commissioner Susan Ness  
Commissioner Rachelle Chong